

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

*Re: Comment Deadlines Established
The LightSquared Technical Working Group Report, IB Docket No. 11-109.*

Commissioners,

The Telecom Council of Silicon Valley would like to voice our support of the recent efforts of LightSquared to proceed towards the launch of their mixed satellite/terrestrial Wireless Wide Area Network (WWAN). We do this with a note of caution, that it is a given that any commercial launch must work within the terms of their license from the FCC in such a way as to limit interference to neighboring bands, specifically the extremely useful and valuable GPS signals. Here in the innovation community in Silicon Valley, many useful services have been invented and built using GPS, and that is newfound utility that we do not want to see compromised. However, inasmuch as LightSquared is able to launch service without harming GPS receivers that work within *their* FCC expected performance specs, we strongly would like to see this new player emerge into the market for WWAN services.

It is obviously not news to the FCC that the take up of mobile broadband services, smart devices, M2M is experiencing an explosive growth. We won't bother to lecture you on this plain reality. It is also obvious that the existing carriers' networks are overburdened in urban areas. A recent Credit Suisse Report (1) said that US wireless networks were operating at 80% of total capacity, the highest in the world. And that is after billions of upgrades and LTE deployments. With demand expected to continue to surge, we need additional WWAN network capacity, and LightSquared will invest the capital to provide some more.

Furthermore, we expect the Department of Justice to approve the merger of AT&T and T-Mobile, which would reduce the number of WWAN providers in the USA. Regardless of whether that occurs or not, the Telecom Council would like to see more national wireless carriers in the USA, as the level of competition here can be debated all day, but it is certainly lower than our friends in Western Europe, and their consumers are reaping the rewards of greater competition. We would like to see US citizens also reap those rewards.

But a greater number of carriers, and more ardent competition is not only good for consumers: the entrepreneurs of Silicon Valley also benefit when there is greater diversity among carriers. They can shop their inventions and fresh ideas to multiple target partners, thus increasing their chances of a fit, and also increasing their chances of finding a carrier hungry enough to try something new or even radical. That's the kind of energy that we think makes the Valley so great, and we'd like to see it represented at the carriers, too. Greater competition will make our great incumbent carriers even better. The USA is a leader in 4G *because* the FCC got the digital dividend spectrum out before other nations, and because the 4 big carriers are competing ferociously in that space. That's great for this nation, and we want more.

One reason we support LightSquared so solidly is that their business model of a facilities-based carrier, selling wholesale to retail Virtual Network Operators (VNO), will not just increase the number of carriers

by one, but by many. LightSquared has already secured commitments from Leap/Cricket Wireless, OpenRange, NetTalk and Best Buy. With those partners, we could see a 3G regional carrier become a 4G national brand, new entrants launch, and a retail giant leverage their distribution to challenge existing facilities-based operators. Each one of those VNOs will have a different market strategy, attack different segments, and probably need to partner with different Silicon Valley startups, as well as numerous tech companies from across the nation. This means growth, jobs, better service, and new service for unaddressed markets.

The last point we will make is that the biggest challenge for a new entrant in the WWAN industry is to get a large coverage footprint. The capital required is simply too high. So we see new entrants taking the easy route of just covering metro areas with dense population. Sure, this benefits a big number of US citizens, but it also leaves out a wide swath of sub-urban and rural Americans. LightSquared's proposed hybrid network will be able to offer affordable satellite coverage to rural residents, and travelers. It will also offer a great safety advantage when field workers or outdoor enthusiasts undergo emergencies outside of normal cellular coverage. We also believe the innovation community will find numerous new uses for a service with true blanket coverage of the nation, and we are looking forward to the opportunities that might present.

Sirs and madams, we won't advise you on technology. We've done no tests, and measured no interference. You define the rules by which LightSquared must play, and you have appropriate testing procedures in place. But what we do request is that you do your utmost to foster increased competition in the US market, and work with this private entity that is willing to take on significant risk with their own capital in their bid to build something that will benefit the nation. If there is interference, then the FCC and the industry should simply work together to find solutions that don't cause interference to correctly functioning GPS receivers. The neighboring spectrum holders will drag heels - thus has it always been. Of course they will, because they have nothing to gain from a LightSquared launch, but do suffer some risk of interference. It is the citizens and the economy that stand to gain. And the entrepreneurs of Silicon Valley.

Regards,
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The Telecom Council is a 100 member industry organization whose goal is to help both established telecom carriers and Silicon Valley entrepreneurs advance the business, science, and progress in the communication industry. We do this through frequent meetings that raise awareness of trends and opportunities, by helping stakeholders meet the right partners and reduce time to market, and by supporting policy that favors competition and progress.

Notes:

(1) <http://www.fiercewireless.com/story/credit-suisse-report-us-wireless-networks-running-80-total-capacity/2011-07-18>